

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 841 Chestnut Building

841 Chestnut Building Philadelphia, Pennsylvania 19107-4431

JUN 21 1994

Mr. Orlando Monaco Naval Facilities Engineering Command Environmental Restoration Branch Mailstop No. 82 10 Industrial Highway Lester, PA 19113-2090

Re: Naval Air Warfare Center (NAWC) - Warminster, PA

Dear Mr. Monaco:

Please consider this a response to your letter of June 9, 1994, and discussions during our meeting of June 15, 1994. In the subject letter, the Navy proposes to issue a Record of Decision (ROD) selecting an Interim Remedial Action for contaminated groundwater attributable to Area C (Operable Unit 3 or OU-3) on September 30, 1994. In addition, as discussed during the subject meeting, the Navy proposes to task a contractor to construct a pump-and-treat system as the Interim Remedial Action for OU-3 some time prior to September 30, 1994.

EPA agrees in principle with the aggressive approach proposed by the Navy and will support this proposal provided that 1) the public is given an opportunity to comment on the selection of a Interim Remedial Action prior to the implementation of any such action and 2) the Navy will not implement the proposed Interim Remedial Action if EPA determines that public comments indicate such an Interim Remedial Action should not be implemented. As proposed, under these circumstances, the actual construction and operation of any pump-and-treat system for Area C should be an optional activity under the contract of concern pending the issuance of the ROD.

In a related matter, as you are aware, recent RI data indicates contaminated groundwater in shallow bedrock attributable to Area A (OU-1) is very likely to extend downgradient of NAWC property. (Note: Area A is located directly adjacent to the NAWC property boundary.) Because RI data available at the time of the issuance of the Interim ROD for OU-1 only suggested this may be the case, the groundwater extraction system under the draft Remedial Design for OU-1 is currently limited to Navy property. However, given the subject recent RI data, the groundwater extraction system

under the Interim Remedial Action for OU-1 will very likely need to extend downgradient of NAWC property. This approach is consistent with EPA comments dated June 3, 1994, on a Remedial Design for OU-1. Per these comments, the configuration of the groundwater extraction system for Area A downgradient of NAWC property should be determined shortly after the completion of planned RI work in the area of concern. As a result, the contract for the Interim Remedial Action for OU-1 should provide for the timely extension of the extraction system to the affected areas downgradient of NAWC property. In addition, the funding to facilitate this timely extension should be secured as soon as necessary.

Should you have any questions or comments regarding the above, please give me a call.

Sincerely,

Darius Ostrauskas

Remedial Project Manager

cc: Brian Nishitani
Kathy Davies
Ben Mykijewycz
David Kennedy, DER
Tom Ames, NAWC